

STATEMENT OF BASIS (AI No. 26109)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0117188 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: USA Truck, Inc.
USA Truck Maintenance & Rest Area
3108 Industrial Park
Van Buren, Arkansas 72956

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: October 30, 2009

1. PERMIT STATUS

--- A. Reason For Permit Action:

--- Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

--- B. LPDES permits -- LA0117188
LPDES permit effective date: June 1, 2004
LPDES permit expiration date: May 31, 2009
LPDES permit modification effective date: July 1, 2004

--- C. Date Application Received: May 28, 2009

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY -- commercial truck maintenance and washing facility

USA Truck is an existing commercial truck maintenance and washing facility. Services provided at the facility are commercial truck maintenance and repair and truck washing. Rest, recreation, and shower facilities for truck drivers are also provided at the site.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4213, 7542

C. LOCATION - 8000 Greenwood Road, Greenwood, Caddo Parish
Latitude 32° 26' 43", Longitude 93° 55' 49"

Statement of Basis for
USA Truck, Inc., USA Truck Maintenance & Rest Area
LA0117188, AI No. 26109
Page 2

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: external truck washwater and floor washdown water
Treatment: oil/water separator
Location: at the point of discharge from the oil/water separator located on the northwest side of the facility
Flow: 350 gpd
Discharge Route: unnamed ditch thence to Page Bayou

Outfall 002

Discharge Type: treated sanitary wastewater
Treatment: two sewage treatment plants with extended aeration
Location: at the point of discharge from the sewage treatment plant located on the east side of the facility
Flow: 270 gpd
Discharge Route: unnamed ditch thence to Page Bayou

4. RECEIVING WATERS

STREAM - unnamed ditch thence to Page Bayou

BASIN AND SEGMENT - Red River Basin, Segment 100310

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply
- e. agriculture
- f. drinking water supply**

**As per LAC33.IX.1111.A, drinking water supply only applies to the named waterbody and does not apply to tributaries or distributaries. This discharge does not go directly to Cross Lake.

5. TMDL STATUS

Subsegment 100310 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. CHANGES FROM PREVIOUS PERMIT

- The sanitary limits in the permit have been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit, and the weekly average limits have been changed to daily max limits.

Statement of Basis for
 USA Truck, Inc., USA Truck Maintenance & Rest Area
 LA0117188, AI No. 26109
 Page 3

7. COMPLIANCE HISTORY/COMMENTS

An inspection at the facility was conducted on August 21, 2009. The findings were as follows: (1) the facility checks Outfall 001 for an oil sheen approximately twice per week; (2) lab analysis is conducted by Gulf States Environmental; (3) J&J Utilities is contracted to maintain the sanitary plants and to collect samples; (4) DMR's are prepared by Gulf States Environmental; (5) there are two discharges on-site, one from the washbay and the other from the sewage treatment plants; (6) one of the sewage treatment plants is above ground and the other is below ground (note there is only one outfall for sanitary wastewater); (7) the above ground mechanical plant had an accumulation of sludge; (8) no chlorine tablets or other means of disinfection were noted in the above ground plant

DMR's were reviewed for the last two years (June 2007 – June 2009). All DMR's were submitted in accordance with the existing permit. The excursions were as follows:

Date	Parameter	Outfall	Reported Value	Permit Limits
6/09	COD	001	240.5 mg/L	200/300 mg/L
1/09	COD	001	240 mg/L	200/300 mg/L
6/08	COD	001	606/907	200/300 mg/L
6/08	Oil & Grease	001	27.2 mg/L	15 mg/L
6/08	BOD ₅	002	46.2 mg/L	45 mg/L
4/08	Oil & Grease	001	17.4 mg/L	15 mg/L
2/08	COD	001	286 mg/L	200/300 mg/L
2/08	Oil & Grease	001	22.5 mg/L	15 mg/L
12/07	COD	001	303 mg/L	200/300 mg/L
10/07	Oil & Grease	001	15.5 mg/L	15 mg/L
10/07	COD	001	223 mg/L	200/300 mg/L
9/07	COD	001	240.5 mg/L	200/300 mg/L
8/07	COD	001	382/553 mg/L	200/300 mg/L
8/07	Oil & Grease	001	25.7 mg/L	15 mg/L

8. EXISTING EFFLUENT LIMITS

Outfall 001 – equipment washwater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - gpd	Report twice per month Est.	Report twice per month Est.
TSS	---	45 mg/L twice per month Grab

Statement of Basis for
 USA Truck, Inc., USA Truck Maintenance & Rest Area
 LA0117188, AI No. 26109
 Page 4

COD	200 mg/L twice per month Grab	300 mg/L twice per month Grab
Oil & Grease	---	15 mg/L twice per month Grab
pH	6.0 - 9.0 s.u. twice per month Grab	
Soaps & Detergents	Report twice per month Inv Calculation	---
Visible Sheen	---	No Presence 1/day Observation

Outfall 002 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow	Report quarterly Est.	Report quarterly Est.
BOD ₅	---	45 mg/L quarterly Grab
TSS	---	45 mg/L quarterly Grab
Fecal Coliform	---	400 col./100mL quarterly Grab
pH	6.0-9.0 s.u. quarterly Grab	

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 100310 of the Red River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is

Statement of Basis for
USA Truck, Inc., USA Truck Maintenance & Rest Area
LA0117188, AI No. 26109
Page 5

required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
 USA Truck, Inc., USA Truck Maintenance & Rest Area
 LA0117188, AI No. 26109
 Page 6

Rationale for USA Truck, Inc.

1. **Outfall 001** – external truck washwater and floor washdown water (estimated flow is 350 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	200	300	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

Treatment: oil/water separator

Monitoring Frequency: daily for Oil and Grease, Visual and twice per month for flow, TSS, COD, oil and grease, and pH at the point of discharge from the oil/water separator located on the northwest side of the facility prior to mixing with other waters. Soaps and Detergents: document a once per month inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

Limits Justification: Limits are based on the previous permit, current guidance for similar discharges from other facilities, and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

2. **Outfall 002** – treated sanitary wastewater (estimated flow is 270 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
BOD ₅	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

Treatment: two sewage treatment plants with extended aeration

Monitoring Frequency: Quarterly for all parameters at the point of discharge from the sewage treatment plant located on the east side of the facility prior to mixing with other waters.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective December 1, 2007.

Statement of Basis for
USA Truck, Inc., USA Truck Maintenance & Rest Area
LA0117188, AI No. 26109
Page 7

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

An SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 4213 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).